

EXHIBIT 4

Francis Malofiy, Esquire
FRANCIS ALEXANDER, LLC
280 N. Providence Rd. | Suite 105
Media, PA 19063
T: (215) 500-1000
F: (215) 500-1005
E: francis@francisalexander.com
Pa. Supreme Court ID No. 208494

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

MICHAEL SKIDMORE, as Trustee for the:
RANDY CRAIG WOLFE TRUST
Plaintiff
v.

LED ZEPPELIN
JAMES PATRICK PAGE
ROBERT ANTHONY PLANT
JOHN PAUL JONES
SUPER HYPE PUBLISHING, INC.
WARNER MUSIC GROUP CORP.

Parent of:

WARNER/CHAPPELL MUSIC, INC.
ATLANTIC RECORDING CORPORATION
RHINO ENTERTAINMENT COMPANY

Defendants

No.: 2:14-CV-03089

CASE FILED:
MAY 31, 2014

CAUSES OF ACTION:
COPYRIGHT INFRINGEMENT

RIGHT OF ATTRIBUTION -
FALSIFICATION OF
ROCK N' ROLL HISTORY

PLAINTIFF'S INITIAL DISCLOSURES

Pursuant to Fed. R. Civ. P. 26(a)(1), Plaintiff makes the following initial disclosures based upon the facts and information currently known and readily available to them at this time. They

	<p>Defendants' admiration and familiarity with Spirit's music, including the song <i>Taurus</i>.</p> <p>Access of the authors of the musical composition <i>Stairway to Heaven</i> to the musical composition <i>Taurus</i>.</p> <p>Substantial Similarity between <i>Taurus</i> and <i>Stairway to Heaven</i>.</p> <p>The technical audio creation, recordation, instrumentation, mixing, and mastering of <i>Taurus</i>.</p> <p>Lack of independent creation and development of <i>Stairway to Heaven</i>.</p> <p>Communications and contact with Plaintiff, the band members of Spirit, Spirit, and/or his representatives.</p>
LOU ADLER	<p>Facts in Plaintiff's Complaint.</p> <p>Facts in Defendants' Answers.</p> <p>The creation and production in or about 1967 of the musical composition <i>Taurus</i> and ownership of the copyright in that musical composition.</p> <p>Led Zeppelin's access to <i>Taurus</i>.</p> <p>Led Zeppelin as the opening act for Spirit.</p> <p>Defendants' admiration and familiarity with Spirit's music, including the song <i>Taurus</i>.</p> <p>Access of the authors of the musical composition <i>Stairway to Heaven</i> to the musical composition <i>Taurus</i>.</p> <p>Substantial Similarity between <i>Taurus</i> and <i>Stairway to Heaven</i>.</p> <p>The technical audio creation, recordation, instrumentation, mixing, and mastering of <i>Taurus</i>.</p> <p>Lack of independent creation and development of <i>Stairway to Heaven</i>.</p> <p>Communications and contact with Plaintiff or Defendants, the band members of Spirit or Led Zeppelin, and/or their representatives.</p> <p>Contracts with Plaintiff, Spirit, and band members of Spirit.</p>
HOWARD FRANK, ESQUIRE	<p>Facts in Plaintiff's Complaint.</p> <p>Facts in Defendants' Answers.</p> <p>Communications and contact with Plaintiff or Defendants, the band members of Spirit or Led Zeppelin, and/or their representatives.</p> <p>Contracts with Plaintiff, Spirit, and band members of Spirit.</p>
<p>INDIVIDUALS TO TESTIFY IN REGARDS TO ACCESS -</p> <p>NOT ALL KNOWN AT THIS TIME OTHER THAN:</p> <p>DEFENDANTS</p> <p>JIMMY PAGE</p> <p>ROBERT PLANT</p> <p>JOHN PAUL JONES</p> <p>MARK ANDES</p> <p>JAY FERGUSON</p> <p>LED ZEPPELIN'S MANAGERS/AGENTS/STAFF</p> <p>SPIRIT'S MANAGERS/AGENTS/STAFF</p>	<p>Facts in Plaintiff's Complaint.</p> <p>Facts in Defendants' Answers.</p> <p>Led Zeppelin's access to <i>Taurus</i>.</p> <p>Led Zeppelin as the opening act for Spirit.</p> <p>Individuals who were at the Spirit concerts where Led Zeppelin was Spirit's opening act.</p> <p>Individuals who were at concerts where Led Zeppelin and Spirit performed together.</p> <p>Defendants' admiration and familiarity with Spirit's music, including the song <i>Taurus</i>.</p> <p>Access of the authors of the musical composition <i>Stairway to Heaven</i> to the musical composition <i>Taurus</i>.</p> <p>The development of <i>Stairway to Heaven</i> with access to <i>Taurus</i>.</p>